

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

Plaintiff, :

- v. - :

: Civil Action No. 16-CV-01257

ALL FUNDS HELD IN ACCOUNT NUMBER :
CH1408760000050335300 AT LOMBARD ODIER :
DARIER HENTSCHE & CIE BANK, SWITZERLAND, :
ON BEHALF OF TAKILANT LIMITED, AND ANY :
PROPERTY TRACEABLE THERETO, ET AL. :

Defendants *in rem*. :
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REQUEST FOR ENTRY OF DEFAULT

TO: RUBY J. KRAJICK, CLERK OF COURT
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Plaintiff, the United States of America, hereby requests the entry of default, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure and Local Admiralty Rule (c)(4), against Gulnara Karimova, Alisher Ergashev, Rustam Madumarov, Gayane Avakyan, Bekhzod Akhmedov, Shokrukh Sabirov, Sodikjon Sokhibjonov, and the entities Takilant and Tozian for failure to file a timely claim, answer or otherwise defend this action after notice was provided pursuant to Rule G of the Supplemental Rules of Admiralty and Maritime Claims and Asset Forfeiture Actions, Federal Rules of Civil Procedure. Further, in support of this request Plaintiff:

- (1) STATES that on February 18, 2016, the United States filed a verified complaint for forfeiture *in rem* (the “Verified Complaint”), initiating the above-captioned action and alleging that the Defendant Property should be forfeited to the United States of America pursuant to 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C) (DN 1);¹

¹ Docket Numbers are referenced herein as “DN”.

- (2) STATES that pursuant to Rule G(4)(b)(i) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, a Notice of Complaint for Forfeiture, the Verified Complaint, and other pertinent documents were sent to last known addresses for Gulnara Karimova, Alisher Ergashev, Rustam Madumarov, Gayane Avakyan, Bekhzod Akhmedov, Shokrukh Sabirov, Sodikjon Sokhibjonov, and the entities Takilant and Tozian;
- (3) STATES that notice of the pendency of this case was posted on an official government internet site (www.forfeiture.gov) pursuant to Rule G of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions starting on February 19, 2016, for thirty (30) consecutive days (DN 6);
- (4) STATES that pursuant to Supplemental Rule G(5)(a) & (b) and the notice sent to Gulnara Karimova, Alisher Ergashev, Rustam Madumarov, Gayane Avakyan, Bekhzod Akhmedov, Shokrukh Sabirov, Sodikjon Sokhibjonov, and the entities Takilant and Tozian, these potential claimants were required to file a claim no later than 35 days after the date of notice, a later date identified in the notice letter, or 60 days after the first publication of notice on the official Government website. Those time periods expired between March 25, 2016 and April 20, 2016, depending on the method of service;
- (5) STATES that Gulnara Karimova, Alisher Ergashev, Rustam Madumarov, Gayane Avakyan, Bekhzod Akhmedov, Shokrukh Sabirov, Sodikjon Sokhibjonov, and the entities Takilant and Tozian have not filed either a claim or an answer to the complaint for forfeiture, or has otherwise appeared or answered in this regard, and the time for them to do so has expired; and
- (6) REQUESTS accordingly that the Clerk enter a default in this case against Gulnara Karimova, Alisher Ergashev, Rustam Madumarov, Gayane Avakyan, Bekhzod Akhmedov, Shokrukh Sabirov, Sodikjon Sokhibjonov, and the entities Takilant and Tozian.

Plaintiff has submitted a proposed Certificate of Default along with this Request.

Respectfully submitted,

M. KENDALL DAY
CHIEF, ASSET FORFEITURE AND
MONEY LAUNDERING SECTION

Dated: April 21, 2016

By: /s/ Marie Dalton
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UNITED STATES OF AMERICA